



201-15251

April 22, 2004

Michael O. Leavitt
Administrator
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attention: Chemical Right-to-Know Program

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Dear Administrator Leavitt:

I am responding on behalf of International Specialty Products (ISP) to your April 12, 2004 letter to Dr. James Griffiths regarding the status of two chemicals that ISP agreed to sponsor under the HPV Challenge Program. First, Dr. Griffiths is no longer employed by ISP. I have assumed his role as ISP's technical contact for the HPV Challenge Program. My contact information is provided below. According to the table attached to your letter, ISP has two overdue commitments under the program, Ethene, methoxy- (CAS Number 107-25-5) and Iron carbonyl (Fe(CO)₅), (TB-5-11) (CAS Number 13463-40-6). ISP does not agree that these commitments are overdue and welcomes this opportunity to clarify their status. ISP would also like to note that our other commitments to the HPV Challenge Program are proceeding on schedule and that we are meeting our commitments to chemicals sponsored through ICCA as well.

ISP's original commitment letter for ethene, Methoxy- (CAS Number 107-25-5) dated November 29, 1999 and available through your website states, "ISP agrees to participate in the HPV Challenge Program by sponsoring testing activities in a cooperative fashion with other global manufacturers..." ISP is meeting its commitment to this OECD SIDS chemical as a member of the ICCA Vinyl Ether Consortium. The sponsorship of ethene, Methoxy- is correctly listed on the HPV Challenge Program website (see Attachment 1). Please update your records to reflect ISP's commitment status correctly.

ISP reported Iron carbonyl (Fe(CO)₅), (TB-5-11) on IUR reports that were used as the basis for the HPV Challenge Program Chemical List. However, since this chemical substance is considered to be inorganic ISP was not required to report it. Its Indicator Status is currently listed on the HPV Challenge Program website as Indicator 3, not subject to the HPV Challenge Program because it is a polymer or inorganic substance (see Attachment 2). ISP's original commitment to sponsor this chemical was an error and ISP is rescinding its sponsorship since this chemical is not part of the HPV Challenge Program. Any additional assessments that ISP may undertake for this chemical will be conducted in cooperation with other global producers.



ISP remains committed to meeting its obligations as a voluntary participant in the HPV Challenge Program. If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

Jane S. Vergnes, Ph.D., DABT
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Product Stewardship Department
International Specialty Products
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2 Attachments

ATTACHMENT 1

**U.S. Environmental Protection Agency**

High Production Volume (HPV) Challenge Program

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Search by casno for **107-25-5****2 total**

casno	chemical	indicate	sponstat	spon_stt2
107-25-5	Ethene, methoxy-	2,4	F,I	SIDS
107-25-5	Ethene, methoxy-	2,4	F,I	ICCA - Vinyl Ether Consortium 2000

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ATTACHMENT 2

U.S. Environmental Protection Agency

High Production Volume (HPV) Challenge Program

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Search by casno for 13463-40-6

1 total

casno	chemical	indicate	sponstat	spon_stt2
13463-40-6	Iron carbonyl (Fe (CO)5), (TB-5-11)-	3	F	International Specialty Products (ISP) [F] 2002

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